

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

TRACEY TRAVIS, individually and  
on behalf of all others similarly situated,

Plaintiff,

Case No. 2:19-cv-11639

v.

Honorable Sean F. Cox

FORD MOTOR COMPANY, a Delaware  
Corporation,

Defendants.

/

**STIPULATED ORDER STAYING CASE**

The matter having come before the Court upon the Stipulation of the  
undersigned Parties:

1. This putative class action arises out of Plaintiff's allegation that Ford Motor Company made false and deceptive representations to consumers concerning the fuel economy ratings of select Ford-brand vehicles.
2. There are four other putative class actions asserting fuel economy-based claims relating to Ford's marketing and sale of the subject vehicles. Those cases are:

- *Cook v. Ford Motor Company*, No. 2:19-CV-00335 (M.D. Ala.)
- *Drake v. Ford Motor Company*, No. 2:19-CV-14165 (S.D. Fla.)
- *Hubert v. Ford Motor Company*, No. 2:19-CV-02125 (C.D. Ill.)
- *Lloyd v. Ford Motor Company*, No. 3:19-CV-11319 (E.D. Mich.)

3. On May 9, 2019, Plaintiffs in the *Cook* and *Hubert* actions jointly filed with the United States Judicial Panel on Multidistrict Litigation (the “Panel”) a motion to transfer pursuant to 28 U.S.C. § 1407 (“Transfer Motion”). The Transfer Motion contends that transfer and coordination are appropriate because the identified cases “involve common questions of law and fact,” which handled together will “benefit the parties, the witnesses, and the courts.”

4. The cases that were not filed at the time of the Transfer Motion will be identified as related matters in connection with the Transfer Motion.

5. Ford is not contesting that transfer and consolidation is appropriate.

6. The parties expect that the Transfer Motion will be fully briefed and ripe for review on or before June 7, 2019; the Panel will likely hear argument on the Transfer Motion on July 25, 2019, and will likely make a decision on transfer within the next several months.

7. The parties agree that a brief stay of this action until the Panel decides the Transfer Motion will promote judicial efficiency and consistency, and that neither the parties nor the progress of the action will be prejudiced by such a stay.

8. The parties agree that the stay shall not prevent any plaintiff from amending his or her complaint as a matter of right.

9. The parties will promptly notify the Court when the Panel issues a decision on the Transfer Motion.

**WHEREFORE**, it is hereby **ORDERED** that this matter is **STAYED** for 120 days or until the Parties notify the Court that the Panel has issued a decision on the Transfer Motion.

**SO ORDERED.**

Dated: 6/12/2019

s/Sean F. Cox  
SEAN F. COX  
United States District Judge

**STIPULATED AND AGREED TO BY:**

By: /s/ Stephanie A. Douglas  
Stephanie A. Douglas (P70272)  
Susan M. McKeever (P73533)  
BUSH SEYFERTH & PAIGE PLLC  
3001 W. Big Beaver Rd., Ste. 600  
Troy, MI 48084  
(248) 822-7800  
[seyferth@bsplaw.com](mailto:seyferth@bsplaw.com)  
[douglas@bsplaw.com](mailto:douglas@bsplaw.com)  
*Attorneys for Defendant Ford Motor Company*

Dated: June 7, 2019

By: /s/ Steve W. Berman (with consent)  
Steve W. Berman  
HAGENS BERMAN SOBOL SHAPIRO LLP  
1918 Eighth Avenue, Suite 3300  
Seattle, WA 98101  
(206) 623-7292  
Fax (206) 623-0594  
[steve@hbsslaw.com](mailto:steve@hbsslaw.com)

Dated: June 7, 2019

*Attorney for Plaintiff Tracey Travis*